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21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION

24 WILLIAM GRAHAM,

25 Plaintiff,

26 vs.

27 AT&T PENSION BENEFIT PLAN -
28 NONBARGAINED PROGRAM; AT&T,
INC.; and DOES 1-10,

Defendants.

CASE NO. 11-CV-4085 TEH

**STIPULATION TO RESCHEDULE CASE
MANAGEMENT CONFERENCE AND
[PROPOSED] ORDER**

Complaint Filed: August 15, 2011

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1 Pursuant to Civil Local Rules 16-2 and 7-12, the Parties stipulate and jointly move for an
2 order from the Court rescheduling to April 30, 2012 the Case Management Conference currently
3 scheduled to be held on March 19, 2012, and for relief from the deadlines associated with that
4 conference.

5 WHEREAS:

- 6 1. On December 12, 2011, the Court set the Case Management Conference for March 19, 2012
7 at 1:30 p.m.
- 8 2. The Parties reached a tentative agreement to settle, but the Parties require additional time
9 before the Case Management Conference to finalize and document their agreement.
- 10 3. The Parties previously filed a stipulated request for the Court to continue the deadline to hold
11 an early neutral evaluation (ENE) from March 9, 2012 to April 16, 2012. By order dated
12 March 7, 2012, the Court granted the Parties' request. In the unlikely event that the
13 settlement is not finalized, the Parties wish to have two weeks between the ENE and the Case
14 Management Conference to allow sufficient time for the Parties to prepare an updated Joint
15 Case Management Statement.
- 16 4. Rescheduling the Case Management Conference will further the interests of judicial
17 efficiency and conserve resources.

18 IT IS HEREBY STIPULATED by and between the parties hereto that the Case
19 Management Conference be rescheduled from March 19, 2012 to April 30, 2012.
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1 Dated: March 8, 2012

PATRICK W. SHEA
STEPHEN H. HARRIS
M'ALYSSA C. MECENAS
PAUL HASTINGS LLP

2
3
4 By: /s/ Patrick W. Shea
PATRICK W. SHEA

5 Attorneys for Defendants
6 AT&T PENSION BENEFIT PLAN – NONBARGAINED
PROGRAM and AT&T, INC.

7 Dated: March 8, 2012

ROGER P. ROZEK

8 By: /s/ Roger P. Rozek
9 ROGER P. ROZEK

10 Attorney for Plaintiff
11 WILLIAM GRAHAM
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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that the Case Management Conference is hereby rescheduled from March 19, 2012 to April 30, 2012. All deadlines associated with that conference are hereby reset. The parties' Joint Case Management Statement is now due no later than April 23, 2012.

DATED: 3/8, 2012

By: 

HON. THELTON E. HENDERSON
United States District Court

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